

SUSSMAN & GOLDMAN

~Attorneys at Law~

1 Railroad Avenue, Suite 3, P.O. Box 1005, Goshen, New York 10924

(845) 294-3991 [Tel]

(845) 294-1623 [Fax]

Christopher D. Watkins

Michael H. Sussman
Jonathan R. Goldman
Eli D. Siems

info@Application granted. The Initial Pretrial Conference
schedule for March 7, 2023 is adjourned to April 12, 2023
at 12:00 p.m. to be held by telephone. At the time of the
scheduled conference, all parties shall call the following
number: (888) 398-2342; access code 3456831.

VIA ECF

March

Hon. Philip M. Halpern, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
March 2, 2023

Re: *Fincher v. City of Newburgh, et al.*
No. 22-cv-10590 (PMH)

Dear Judge Halpern,

This office represents the plaintiff in the above-referenced matter. An initial conference is presently scheduled for March 7, 2023. After the exchange of letters as required by the Court's rules and upon conferring with opposing counsel, the parties have agreed to allow plaintiff to amend the complaint to, *inter alia*, identify the John Doe defendants by name. We are in the process of preparing and executing a stipulation to this effect, which would have plaintiff file her amended complaint by March 10, 2023 and require defendants to answer or move in accordance with Your Honor's rules within 21 days of service. In light of this, the parties jointly respectfully request that the March 7 conference be adjourned until sometime after defendant files its response to the amended complaint. We also understand defense counsel will be out of the country on March 7th and would also ask for the adjournment in light of her unavailability. We thank the court for its consideration of this request.

Respectfully submitted,

Jonathan R. Goldman, Esq.

cc: All counsel of record via ECF